

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

MAVERICK RECORDING COMPANY, a ) CIVIL ACTION No. 04-40167-FDS  
California joint venture; ARISTA RECORDS, )  
INC., a Delaware corporation; UMG )  
RECORDINGS, INC., a Delaware corporation; ) The Hon. F. Dennis Saylor  
WARNER BROS. RECORDS INC., a )  
Delaware corporation; ATLANTIC )  
RECORDING CORPORATION, a Delaware )  
corporation; and BMG MUSIC, a New York )  
general partnership, )  
Plaintiffs, )  
v. )  
LISA HAGERTY, )  
Defendant. )

**MOTION FOR ENTRY OF DEFAULT JUDGMENT  
AGAINST DEFENDANT LISA HAGERTY**

Plaintiffs apply for entry of default judgment against Defendant Lisa Hagerty ("Defendant") pursuant to Rule 55 of the Federal Rules of Civil Procedure and the Local Rules of the District of Massachusetts. This application is based on the Memorandum of Law filed in support of this Motion, the attached declaration of counsel, the pleadings and files in this action, and such additional argument and evidence that may be presented at or before any hearing that the Court may order on this Motion. In particular, Plaintiffs state as follows:

1. The Clerk of this Court has entered the default of Defendant.
2. Defendant has not appeared in this action.
3. Plaintiffs are informed and believe that Defendant is not an infant or incompetent person, or in active military service.

The judgment sought is the minimum statutory damages provided by Section 504 of the Copyright Act (\$750) for each of the infringements alleged in the complaint, injunction pursuant to Section 502 of the Copyright Act, and costs, pursuant to Section 505 of the Copyright Act. Accordingly, Plaintiffs respectfully request that the Court enter default judgment in favor of Plaintiffs and against the Defendant.

MAVERICK RECORDING CO.; ARISTA RECORDS, INC.; UMG RECORDINGS, INC.; WARNER BROS. RECORDS INC.; ATLANTIC RECORDING CORP.; and BMG MUSIC

By their attorneys,

DATED: January 21, 2005

By: /s/ Gabriel M. Helmer  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of January, 2005, I caused a true copy of the above document to be served upon Defendant by mail.

/s/ Gabriel M. Helmer